



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Neil Reiff
Mr. James Lamb
Mr. Joseph Birkenstock
Sandler Reiff Lamb Rosenstein & Birkenstock, P.C.
1025 Vermont Avenue, NW
Suite 300
Washington, DC 20005

MAR 22 2016

RE: MUR 6916
Respondents listed in Attachment A

Dear Messrs. Reiff, Lamb & Birkenstock:

On March 2, 2015, the Federal Election Commission notified your clients, Respondents listed here in Attachment A, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On March 15, 2016, the Commission found, on the basis of the information in the complaint, and information provided by multiple respondents, that there is no reason to believe the Respondents listed in Attachment A violated 52 U.S.C. §§ 30116, 30118, or 30119 by making or receiving prohibited in-kind contributions in the form of data and analytical tools and no reason to believe the Committee violated 52 U.S.C. §§ 30116 or 30118 by making or receiving prohibited or excessive in-kind contributions in the form of coordinated communications. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). The Factual and Legal Analysis, which explains the Commission's findings, is enclosed for your information.

If you have any questions, please contact Meredith McCoy, the attorney assigned to this matter at (202) 694-1650.

Sincerely,

Peter G. Blumberg
Assistant General Counsel

Enclosures:
Attachment A
Factual and Legal Analysis

**FEDERAL ELECTION COMMISSION
ATTACHMENT A**

Democratic Executive Committee of Florida
and Judy Mount in her official capacity as
treasurer

Maine Democratic State Committee and Betty
Johnson in her official capacity as treasurer

Mississippi Democratic Party PAC and Ryan
Brown in his official capacity as treasurer

Democratic Party of New Mexico and Robert
Lara in his official capacity as treasurer

Ohio Democratic Party and Fran Alberty in her
official capacity as treasurer

Tennessee Democratic Party and Wade
Munday in his official capacity as treasurer

Texas Democratic Party and Gilberto Hinojosa
in his official capacity as treasurer

Vermont State Democratic Committee Federal
Account and James Ashley in his official
capacity as treasurer

Adam Smith for Congress Committee and Jay
Pettersen in his official capacity as treasurer

Andre Carson for Congress and Timothy J.
Moriarty in his official capacity as treasurer

Cain for Congress and Jeremy Fischer in his
official capacity as treasurer

Castro for Congress and Jose H. Villareal in his
official capacity as treasurer

Denny Heck for Congress and Jay Pettersen in
his official capacity as treasurer

Eggman for Congress 2014 and Jay Pettersen
in his official capacity as treasurer

Elisabeth Jensen for Congress and Laura Anne
D'Angelo in her official capacity as treasurer

Filemon Vela for Congress and Mary Jo Vela
in her official capacity as treasurer

Friends for Jim McDermott and Philip Lloyd in
his official capacity as treasurer

Friends of Elizabeth Esty and Patti Flynn-
Harris in her official capacity as treasurer

Friends of Estakio and Jay Pettersen in his
official capacity as treasurer

Friends of Jared Polis Committee and Edith R.
Hooton in her official capacity as treasurer

Friends of Renteria and Jay Pettersen in his
official capacity as treasurer

Hanabusa for Hawaii and George S.
Yamamoto in his official capacity as treasurer

John Carney for Congress and Charles J.
Durante in his official capacity as treasurer

Karen Spilka for Congress Committee and
Judy Sandra Kalisker in her official capacity as
treasurer

Kathleen Rice for Congress and Margaret May
in her official capacity as treasurer

Levin for Congress and Jeremy Mahrle in his
official capacity as treasurer

Montanans for Lewis and Holly Giarraputo in
her official capacity as treasurer

Morton for Congress and Linda A. Ward in her
official capacity as treasurer

THE STATION

Walsh for Montana and Holly Giarraputo in her official capacity as treasurer

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Democratic National Committee, *et al.*¹

MUR: 6916

I. INTRODUCTION

This matter concerns a complaint against the Democratic National Committee ("DNC"), the Democratic Senatorial Campaign Committee ("DSCC"), the Democratic Congressional Campaign Committee ("DCCC"), 11 state and local Democratic Party committees (collectively, "Party Committee Respondents"); 384 authorized candidate committees (collectively, "Authorized Committee Respondents")²; and 2 vendors, Catalist, LLC ("Catalist") and NGP VAN, LLC ("NGP VAN").³

The Complaint alleges that, beginning in the 2006 election cycle and continuing to the present, Respondents violated the Federal Election Campaign Act, as amended, (the "Act"), in three ways.⁴ First, the Complaint alleges that Catalist, a limited liability company and government contractor, made excessive or prohibited in-kind contributions to the Respondent Committees by providing data and services at below-market rates. Second, the Complaint contends that Catalist and NGP VAN acted as "common vendors" and shared voter data they received from the Respondent Committees with other non-campaign clients making independent

¹ See Appendix A for the complete list of respondents. As indicated in the Appendix, the Commission received numerous responses in this matter. Many responses were filed on behalf of a single entity, while others were filed jointly on behalf of numerous respondents.

² The Commission terminated 78 of the 384 Authorized Committee Respondents before the complaint was filed. As of the date of this report, the Commission has rejected termination requests from 35 additional Authorized Committee Respondents based on the pendency of this matter.

³ The Complaint names 400 respondents. All references in this report to "Respondents" are intended to include all 400 respondents; references to "Respondent Committees" include the 14 Party Committee Respondents and 384 Authorized Committee Respondents.

⁴ Pursuant to 52 U.S.C. § 30145(a), the statute of limitations has run with respect to activity that occurred more than five years ago.

1 expenditures. As a result, these unnamed organizations allegedly made excessive or prohibited
2 in-kind contributions to Respondent Committees in the form of coordinated communications.
3 Third, the Complaint asserts that the DNC established, finances, maintains, or controls Catalist,
4 and through Catalist, has accepted contributions in violation of the soft money ban.⁵

5 As discussed below, none of the Respondents appear to have violated the Act.
6 Accordingly, the Commission finds: (1) no reason to believe Respondents violated 52 U.S.C.
7 §§ 30116, 30118, or 30119 by making or receiving excessive or prohibited in-kind contributions
8 in the form of discounted data and services; (2) no reason to believe Respondent Committees
9 violated 52 U.S.C. §§ 30116 or 30118 by receiving excessive or prohibited in-kind contributions
10 in the form of communications coordinated through alleged common vendors Catalist and NGP
11 VAN; and (3) no reason to believe the DNC or Catalist violated 52 U.S.C. § 30125 by soliciting,
12 receiving, or directing funds that were not subject to the prohibitions, limitations, and reporting
13 requirements of the Act.

14 II. FACTS

15 A. Catalist

16 1. Description of Catalist's Business and Operations

17 Catalist was formed in 2005 "for the purpose of providing data and analytic tools to its
18 customers."⁶ The company has a variety of clients, including candidates, political committees,
19 nonprofit organizations, colleges and universities, and media outlets.⁷ It is also a federal

⁵ Compl. at 18 (Feb. 18, 2015).

⁶ Catalist Resp. at 1.

⁷ Catalist Resp. at 1 & n.1 (Apr. 9, 2015).

1 contractor, having received two awards from the Government Accountability Office in 2014
2 totaling \$64,970.⁸

3 Harold Ickes and Laura Quinn founded Catalist in 2005. Both have ties to the
4 Democratic Party. Ickes served as White House Deputy Chief of Staff under President Clinton
5 and is a member of the DNC and the DNC's Rules and Bylaws Committee, while Quinn served
6 as Deputy Chief of Staff for Vice President Gore and consultant to various Democratic
7 candidates and officeholders.⁹

8 According to Catalist, the company uses a subscription-based pricing model for its data
9 sales.¹⁰ Under this model, clients pay a flat fee for year-long access to a particular "tier" of data
10 and analytical tools.¹¹ Catalist bases its prices on the tier a client selects and the geographic
11 scope of the client's needs.¹²

12 Catalist has provided a sworn affidavit from Quinn certifying that the company uses this
13 same pricing model for all clients.¹³ Quinn affirms that "Catalist provides services based on each
14 customer's needs with a consistent market driven pricing schedule applied evenly to all
15 customers. No favored deals are provided to any federal candidates or committees."¹⁴ This

⁸ Compl. at 19 & Ex. A.

⁹ Both Catalist and the DNC assert that the DNC did not authorize or play an active or significant role in establishing Catalist and does not have any authority to participate in or direct Catalist's operations. DNC Resp. at 4-5 & Ex. A, Declaration of Brad Marshall ("Marshall Declaration") (July 16, 2015). The DNC also notes that Ickes is 1 of 451 members of the DNC and 1 of 30 members of the Rules and Bylaws Committee. DNC Resp. at 5.

¹⁰ Catalist Resp. at 7 & Ex. A (Aff. of Laura Quinn, *hereafter* "Quinn Aff.").

¹¹ *Id.*

¹² *Id.*

¹³ Quinn Aff. ¶ 8; *see also* Catalist Resp. at 3 ("Catalist has a consistent, usual and normal pricing structure within which all contracts fall. . . . No favored deals are provided to any federal candidates or committees.").

¹⁴ Quinn Aff. ¶ 8.

1 assertion is supported by the terms of at least one Respondent Committee's contract with
2 Catalist. Specifically, Respondent Hillary Clinton for President ("HCFP") provided a copy of its
3 2007 Data License and Services Agreement with Catalist, which warrants that the terms of
4 Catalist's service to HCFP were comparable to the terms available to Catalist's non-campaign
5 clients and not intended to result in a contribution to the committee.¹⁵ The Complaint alleges
6 that the resulting prices are below the usual and normal charge for such goods. The Complaint
7 cites statements from the 2012 book, *The Victory Lab*, by reporter Sasha Issenberg, which
8 chronicles the growing role of statistical modeling in political campaigns.¹⁶ Issenberg writes that
9 Catalist has "little interest in profit," and "pay[s] attention to revenue but [is] more interested in
10 keeping its prices down to help partisan and ideological allies win elections."¹⁷ These statements
11 are not attributed to any source.

12 With the exception of HCFP, neither the Complainant nor the Respondents present
13 information about the specific rates that Catalist charged its clients or the other terms of their
14 contracts. However, the Commission's disclosure database shows that since 2010, only 15 of the

¹⁵ HCFP Resp. at Ex. A (Apr. 14, 2014). The Contract states:

[Catalist's] performance of the Services, and the terms and conditions contained herein, shall not knowingly be in violation of any applicable laws, rules, or regulation, in that these terms and provisions would be available to and required of non-campaign clients of Catalist and are no more or less favorable than offered to non-campaign clients, if any. Catalist intends to fully comply with all applicable Federal Election Commission regulations and has examined and structured this arrangement so as to prevent a contribution from resulting from either (a) Catalist to Customer or (b) another customer of Catalist to Customer.

Id. at 5 & Ex. A at 8.

No other Respondents submitted copies of their contracts.

¹⁶ Compl. at 19 (citing SASHA ISSENBERG, *THE VICTORY LAB* (Crown Publishers, 2012) (*hereafter*, *THE VICTORY LAB*)).

¹⁷ Compl. at 20.

- 1 398 Respondent Committees reported disbursements to Catalist, ranging from the Monterey
- 2 County Democratic Central Committee Federal's disbursement of \$250 in 2012 to the DSCC's
- 3 total payment of \$247,750 in 2010. Below is a complete list of the Respondent Committees that
- 4 have reported disbursements to Catalist since 2010:

Respondent	Years Contracted	Amount(s) Paid to Catalist ¹⁸
DNC	2011	\$ 12,000.00
	2010	\$ 76,333.93
DSCC	2014	\$ 53,337.00
	2011	\$ 9,000.00
	2010	\$ 247,750.00
DCCC	2012	\$ 153,300.00
	2010	\$ 171,000.00
Committee to Elect Alan Grayson	2014	\$ 30,750.00
	2012	\$ 21,000.00
Garamendi for Congress	2012	\$ 3,040.00
Ami Bera for Congress	2012	\$ 500.00
Becerra for Congress	2012	\$ 13,668.50
Garamendi for Congress	2012	\$ 3,040.00
Texans for Henry Cuellar Congressional Committee	2010	\$ 1,019.71

¹⁸ FEC, CAMPAIGN FINANCE DISCLOSURE PORTAL, <http://www.fec.gov/pindex.shtml>. Additional Respondent Committees disclosed disbursements to Catalist before 2010. For example, Hillary Clinton for President paid Catalist \$370,525 in 2007; Obama for America paid Catalist \$25,250 and \$50,250 in 2007 and 2008, respectively; and the DCCC reported an additional \$115,000 in disbursements to Catalist in 2009.

Arizona State Democratic Central Executive Committee	2011	\$ 3,500.00
Democratic Executive Committee of Florida	2015	\$ 10,520.00
	2013	\$ 10,000.00
Monterey County Democratic Central Committee Federal	2012	\$ 250.00
Ohio Democratic Party	2012	\$ 21,000.00
	2010	\$ 9,950.00
Texas Democratic Party	2014	\$ 17,049.00
	2013	\$ 19,998.00
Vermont State Democratic Federal	2011	\$ 500.00
	2010	\$ 2,250.00

1 None of the remaining Respondent Committees have disclosed disbursements to Catalist
2 since 2010, and, in fact, many Respondent Committees deny having ever contracted with
3 Catalist.¹⁹ We have no information that suggests the Respondent Committees used Catalist's
4 data services without a contract or payments to Catalist.

5 In addition to the statements regarding Catalist's motives, the Complaint alleges that
6 Catalist uses investments from wealthy donors to keep costs low for political clients and
7 maintain a price structure that is below the usual and normal charge.²⁰ Catalist acknowledges
8 that, in addition to its customer subscriptions, the company raises revenue through private

¹⁹ See, e.g., Resp. of DCCC *et al.* at 2 (Apr. 27, 2015); Friends of Michelle Resp. (Apr. 12, 2015); Walsh for Mont. Resp. (Apr. 24, 2015); Morton for Congress Resp. (Apr. 24, 2015); Resp. of Adam Smith for Congress, *et al.* (Apr. 24, 2015).

²⁰ Compl. at 21-22.

1 offerings²¹ The Complaint alleges that by the end of 2006, the company initiated two private
2 offerings for investors,²² and in 2013, it announced another major fundraising effort, with a lead
3 investment of \$2.25 million by George Soros.²³ In 2014, the Democracy Alliance, a network of
4 supporters of liberal causes and candidates, also appears to have encouraged its members to
5 invest in Catalist.²⁴ Catalist asserts that “the provision of data and information services is a
6 legitimate business opportunity in the political arena and elsewhere.”²⁵ The company also points
7 to its nonpolitical customers, such as AOL, Pandora, Yahoo!, the Pew Charitable Trusts, and
8 many major educational institutions, to demonstrate that it is a legitimate data service provider.²⁶

9 2. Data Sharing Between Catalist and Respondent Committees

10 The Complaint contends that, as part of their agreements with Catalist, Respondent
11 Committees share their internal voter files with the company on an ongoing basis. It asserts that
12 if a Catalist customer obtains new information about a voter — for example, from a voter
13 registration card it collects — Catalist receives that information in a regular “syncing” of the
14 customer’s list with Catalist’s servers.²⁷ This regular merging, the Complaint argues, folds
15 customers’ data into the Catalist database and makes the information immediately available to

²¹ Catalist Resp. at 2 & Quinn Aff. at 1; *see also* Compl. at 19, 21.

²² Catalist Resp. at 2.

²³ Compl. at 21.

²⁴ *Id.* at Ex. B (DEMOCRACY ALLIANCE, SPRING 2014 INVESTMENT RECOMMENDATIONS at 17-18 (2014) (urging Democracy Alliance partners to provide “baseline support for Catalist of at least \$500,000....”).

²⁵ Catalist Resp. at 6, 7 (citing Jason Morris and Ed Lavandera, *Why Big Companies Buy, Sell Your Data*, CNN.COM (Aug. 23, 2012), <http://www.cnn.com/2012/08/23/tech/web/big-data-axiom/>; Shefali Luthra, *Big Data Offer New Strategy For Public Health Campaigns*, KAISER HEALTH NEWS (Dec. 3, 2014), <http://khn.org/news/big-data-offer-new-strategy-for-public-health-campaigns/>).

²⁶ Catalist Resp. at 3, 6-7 & n.2.

²⁷ Compl. at 22 (citing THE VICTORY LAB).

1 other Catalist customers.²⁸ The Complaint bases this assertion on a quote from *The Victory Lab*
2 regarding President Obama's 2008 campaign's relationship with Catalist and NGP VAN,
3 alleging that the campaign was alerted to new voters before their registrations were processed.²⁹

4 Issenberg does not identify sources for this account. Catalist disputes Issenberg's
5 account, stating that Catalist customers retain ownership of the data and information they provide
6 to Catalist, and that, pursuant to Catalist's Data Services and Licensing Agreement, Catalist
7 shares data between clients only pursuant to "legally sufficient written list exchange or purchase
8 agreement[s], executed by both exchanging parties."³⁰

9 **B. NGP VAN**

10 NGP VAN is a "for-profit company that provides campaign management software to
11 candidates, political committees and organizations that are engaged in political activity at the
12 federal, state and local level."³¹ The Commission's disclosure data shows that all but 4 of the 398
13 Respondent Committees reported disbursements to NGP VAN between 2010 and the present.³²

14 The Complaint alleges that NGP VAN has "joined forces" with Catalist to "create a
15 seamless link across the activist left" to facilitate the sharing of customer data.³³ The implication
16 appears to be that Catalist customers use NGP VAN software to compile voter data and maintain

²⁸ *Id.*

²⁹ *Id.*

³⁰ Catalist Resp. at 8 & Quinn Aff. ¶ 10.

³¹ NGP VAN Resp. at 1 (Apr. 12, 2015).

³² FEC, CAMPAIGN FINANCE DISCLOSURE PORTAL, <http://www.fec.gov/pindex.shtml>.

³³ Compl. at 22.

1 internal lists, and a partnership between NGP VAN and Catalist allows the easy merging of
2 customer lists with the Catalist database.³⁴

3 NGP VAN denies the allegation that it facilitates coordination³⁵

4 Cooper for Congress Committee ("Cooper"), the principal campaign committee of Rep.
5 Jim Cooper (TN-05), provided a copy of a relevant licensing agreement for NGP VAN's
6 "contribution web package," which gave Cooper access to NGP VAN's web-based software for
7 managing campaign data and filing campaign finance reports, as well as a lease to use space on
8 NGP VAN's servers.³⁶ Section 7(b) of the agreement provides that "[a]ny data placed in the
9 Software by Licensee and any data specific to Licensee e-mail list or volunteer sign-ups or
10 online contributions are the property of the Licensee and shall not be used by NGP VAN for any
11 purpose other than in connection with the performance of this Agreement."³⁷

12 **C. Respondent Committees**

13 The remaining 398 Respondents are party and authorized candidate committees that are
14 alleged to have contracted with Catalist, NGP VAN, or both.³⁸ The list includes the DNC, the
15 DSCC, the DCCC, 10 state party committees, and the authorized committees of 2 former
16 presidential candidates, 43 Senate candidates, and 339 House candidates.

³⁴ *Id.*

³⁵ NGP VAN Resp. at 1.

³⁶ Cooper Resp. at 2-3 & Ex. 1 (Apr. 21, 2015). Jeff Holmes for Congress, the principal campaign committee of an unsuccessful candidate for Michigan's Fourth District, submitted a contract for website design and did not appear to include the exchange of voter data. See Jeff Holmes for Congress Resp. (March 13, 2015).

³⁷ *Id.* at Ex. 1.

³⁸ As indicated above, 15 of the Respondent Committees appear to have contracted with Catalist between 2010 and the present, and 394 of the Respondent Committees appear to have contracted with NGP VAN during the same period.

1 **III. LEGAL ANALYSIS**

2 **A. Respondents Did Not Make or Receive Excessive or Prohibited**
3 **Contributions in the Form of Goods Provided at Less Than the "Usual and**
4 **Normal Charge"**

5 The Act defines "contribution" as "any gift, subscription, loan, advance, or deposit of
6 money or anything of value made by any person for the purpose of influencing any election for
7 Federal office."³⁹ Under the Commission's regulations, the provision of any goods or services
8 without charge or at a charge that is "less than the usual and normal charge" for such goods or
9 services is a contribution.⁴⁰ The "usual and normal charge" for goods is "the price of those
10 goods in the market from which they ordinarily would have been purchased at the time of the
11 contribution."⁴¹ The "usual and normal charge" for non-volunteer services is "the hourly or
12 piecework charge for the services at a commercially reasonable rate prevailing at the time the
13 services were rendered."⁴² The Commission has previously opined that entities may establish the
14 "usual and normal charge" of goods or services by reference to the "fair market price" of goods

³⁹ 52 U.S.C. § 30101(8)(A)(i).

⁴⁰ 11 C.F.R. § 100.52(d)(1).

⁴¹ *Id.* at § 100.52(d)(2).

⁴² *Id.*

1 or services,⁴³ “commercial considerations,”⁴⁴ or the fee provided to “similarly situated persons in
2 the general public.”⁴⁵

3 Under the Act, a federal contractor may not make contributions to political parties or
4 candidates.⁴⁶ A limited liability company that is not a federal contractor may make contributions
5 to parties and candidates under certain circumstances,⁴⁷ but such contributions are subject to the
6 Act’s limits.⁴⁸ Correspondingly, federal candidates, their authorized committees, and political
7 party committees may not knowingly accept a prohibited or excessive contribution.⁴⁹

8 According to the Complaint, Catalist has provided goods and services to the Respondent
9 Committees at rates below “the usual and normal charge” since 2006.⁵⁰ The Complaint does not
10 present any information about how much Catalist charges the Respondent Committees or the

⁴³ See MUR 5682 (Bachmann for Congress) (finding that the respondent assigned an appropriate valuation to a mailing list where the respondent had consulted with a “reputable list broker” regarding the “proper fair market value” of the list); see also AO 2010-30 (Citizens United) (“Because the ‘fair market price’ is the price of the list in the market in which lists are ordinarily rented at the time of the rental, the ‘fair market price’ is the usual and normal charge for renting the list [of email contacts].”).

⁴⁴ AO 2012-31 (AT&T) (concluding that AT&T’s proposed rate structure for text-message fundraising would not result in it making contributions to political committees, although rates would be lower than those AT&T usually charges to use its text message platform, the proposed rates would “reflect[] commercial considerations”).

⁴⁵ AO 2004-6 (Meetup) (concluding that a fee is usual and normal if the charge is “set in accordance with the fixed set of fee criteria” and “applied equally between the various classes of candidates... and other members of the general public who are similarly situated with respect to the respective classes of candidates and political committees.”); see also AO 2014-09 (Reed Marketing).

⁴⁶ 52 U.S.C. § 30119(a); see also *Wagner v. FEC*, No. 1:11-cv-01841 (D.C. Cir. July 7, 2015) (en banc).

⁴⁷ 11 C.F.R. § 110.1(g)(2) (permitting limited liability companies to make contributions pursuant to 11 C.F.R. § 110.1(e) (regarding contributions by partnerships) when the limited liability company has elected to be treated as a partnership for IRS purposes and when the LLC has not made an election to be treated as either a partnership or a corporation). We do not know whether Catalist has elected to be treated as a partnership by the Internal Revenue Service.

⁴⁸ See 11 C.F.R. § 110.1(e).

⁴⁹ 52 U.S.C. §§ 30116, 30118, 30119.

⁵⁰ Compl. at 20-21.

1 extent to which those prices differed from prevailing market rates. Instead, the Complaint infers
2 that the Respondent Committees received discounted rates from statements in *The Victory Lab*
3 that Catalist lacked a profit motive and information showing that Catalist receives significant
4 investments from wealthy Democratic backers.⁵¹ There is no other available information to
5 support these allegations.

6 Respondents have presented specific and sworn information to refute the allegation.
7 According to Quinn and several of the Respondent Committees that have contracted with
8 Catalist, the respective contracts were arm's-length commercial transactions, for which the
9 Respondent Committees paid significant sums.⁵² Moreover, Quinn affirms that Catalist uses
10 fixed criteria to determine how much it charges its clients, and that these criteria are applied
11 equally to similarly-situated political and non-political clients.⁵³ Further, Catalist has a long list
12 of non-political clients, including AOL, Pandora, Yahoo!, the Pew Charitable Trusts, major
13 universities such as Harvard, Stanford, Duke and Yale, and the federal government.⁵⁴ And

⁵¹ See Part II.A.1.

⁵² Catalist Resp. at Quinn Aff. ¶ 9 ("All contracts are negotiated at arms [sic] length between Catalist and its customers."); Resp. of DCCC *et al.* at 2; HCFP Resp. at 4-5; Resp. of Democratic Excc. Comm. of Fla., *et al.* (Apr. 24, 2015); see also *supra* Part II.A.1.

⁵³ Catalist Resp. at 6-7. This fact alone may suffice to show that Catalist's rates are "usual and normal." We currently lack information — such as the number of names or data points purchased by particular Respondent Committees — that would typically establish whether lists were purchased at market value. However, the Commission has previously opined that a vendor does not make a contribution to a political committee when the vendor uses fixed criteria to determine its price structure and applies those criteria equally to similarly-situated political and non-political clients. AO 2004-6 (Meetup). Here, the available information suggests that Catalist uses fixed criteria (namely, the types of data and analytics required and geographic scope of a contract) to determine its prices. The company claims to apply these criteria to all clients, whether political or not, a claim which is consistent with the terms of the 2007 HCFP-Catalist contract. See Part II.A.2. Admittedly, without details about the tiers and geographic areas selected by particular Respondent Committees or information about the rates Catalist offers to other similarly-situated clients, we cannot conclusively establish that Catalist's rates satisfy the *Meetup* standard; however, the company's sworn statements and the HCFP contract indicate that they do.

⁵⁴ Catalist Resp. at 2 & n.2.

1 although Catalist's founders and prominent investors are noted Democratic supporters, that fact
2 alone would not support an inference that Catalist provides any goods or services at less than the
3 usual and normal charge. Here, moreover, the company has presented information to show that
4 data brokering in general — and Catalist in particular — is a legitimate business that serves a
5 wide range of clients and can produce significant profits and other opportunities.⁵⁵ In light of
6 this information, the Complaint's suggestion that investments in Catalist were motivated by
7 anything other than business considerations is speculative and unsupported by the available facts.

8 Based on the apparent speculative assertions in the Complaint and direct refutations of
9 the allegations by the Respondents, supported by a sworn affidavit, there is insufficient
10 information available to proceed. Accordingly, the Commission finds no reason to believe that
11 Catalist or the Respondent Committees violated 52 U.S.C. §§ 30116, 30118, or 30119.

12 **B. Respondent Committees Did Not Receive Excessive or Prohibited**
13 **Contributions in the Form of Coordinated Communications Through**
14 **Common Vendors**

15 According to the Complaint, the Respondent Committees coordinated with unnamed
16 third-party organizations on unspecified communications made between 2006 and the present by
17 sharing strategic data through common vendors, Catalist and NGP VAN.⁵⁶ The Complaint
18 alleges that these coordinated communications constitute excessive, prohibited, or unreported in-
19 kind contributions from the third-party organizations to the Respondent Committees.⁵⁷

20 The Act considers any expenditure made by a person "in cooperation, consultation, or
21 concert, with, or at the request or suggestion of, a candidate, authorized political committee, or a

⁵⁵ Catalist Resp. at 7; *see also supra* Part II.A.1.

⁵⁶ Compl. at 25-26.

⁵⁷ *Id.*

1 national or state party committee” to be an in-kind contribution.⁵⁸ These are considered
2 “coordinated expenditures.”⁵⁹ Under Commission regulations, an expenditure for a
3 communication is coordinated when the communication: (1) is paid for, in whole or part, by a
4 person other than the candidate, committee, or party; (2) satisfies at least one of the content
5 standards described in 11 C.F.R. § 109.21(c); and (3) satisfies at least one of the conduct
6 standards described in 11 C.F.R. § 109.21(d).⁶⁰

7 The Complaint generally alleges that the payment and content standards may be satisfied
8 by the fact that non-campaign clients of Catalist and NGP VAN “spent upwards of \$100 million
9 on public communications that advocate the election of Democrat [*sic*] candidates or defeat of
10 Republicans” in the 2014 election cycle.⁶¹ It goes on to list a “sample” of Catalist and NGP
11 VAN clients that reported independent expenditures during the 2014 election cycle and alleges
12 that Catalist and NGP VAN acted as “common vendors” between the Respondent Committees
13 and the groups making the alleged communications.⁶² However, the information in the record
14 before the Commission does not satisfy the conduct prong.

⁵⁸ 52 U.S.C. § 30116(a)(7)(B)(i)-(ii); *see also* 11 C.F.R. §§ 109.20, 109.21(b).

⁵⁹ 11 C.F.R. § 109.20.

⁶⁰ *Id.* § 109.21(a)(1)-(3).

⁶¹ Compl. at 23 (citing a general search page on OpenSecrets.org permitting a user to search by “viewpoint” of the spender).

⁶² *Id.* at 23. (“A sample of [Catalist’s] soft-money outside groups include America Votes, EMILY’s List, Ready for Hillary, AFL-CIO Workers’ Voices, NARAL, League of Conservation Voters, Planned Parenthood, and SEIU’s federal committee. [citation omitted] Combined with the reported independent expenditures of the DSCC and DCCC, these and other Catalist client outside groups spent over \$100 million in public communications and other reportable ‘independent expenditures’ this cycle.”); *see also id.* at 26 (“[O]utside groups, such as EMILY’s List, have access to the Democratic political party and federal candidate client lists and voter data files through the ‘seamless links across the activist left’ created by Catalist.”); 25-27.

1 The "common vendor" standard is satisfied if all of the following are true: (1) the person
2 paying for the communication employs a commercial vendor⁶³ to "create, produce, or distribute"
3 the communication; (2) the vendor has provided certain delineated services to the recipient of the
4 contribution during the 120 days preceding the communication; and (3) the vendor conveys non-
5 public information about the campaign's "plans, projects, activities, or needs," or services
6 previously provided to the campaign by the vendor, and that information is material to the
7 creation, production, or distribution of the communication.⁶⁴

8 Here, the "common vendor" standard is not met because no information suggests that
9 either Catalist or NGP VAN provide services to "create, produce, or distribute" communications.
10 Catalist sells access to data files and analytical tools and clients may then, at their own
11 discretion, use the selected data and tools to carry out campaign activities. Similarly, NGP VAN
12 sells licenses to use its software, which licensees may then use to carry out various campaign
13 activities. The available information does not indicate that either Catalist or NGP VAN help
14 clients select data or use selected data to achieve particular ends. Accordingly, neither Catalist
15 nor NGP VAN appears to be a commercial vendor employed to "create, produce, or distribute"
16 communications for their clients under the "common vendor" standard.⁶⁵ Because all three

⁶³ "Commercial vendor" means any persons providing goods or services to a candidate or political committee whose usual and normal business involves the sale, rental, lease or provision of those goods or services. 11 C.F.R. § 116.1(c).

⁶⁴ 11 C.F.R. § 109.21(d)(4)(i)-(iii).

⁶⁵ 11 C.F.R. § 109.21(d)(4)(i); Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 436 (Jan. 3, 2003) ("Thus, this standard only applies to a vendor whose usual and normal business includes the creation, production, or distribution of communications, and does not apply to the activities of persons who do not create, produce, or distribute communications as a commercial venture."); *see also* MUR 6077 (Norm Coleman) (finding that no coordination occurred where a vendor did not participate in creating, producing or distributing advertisements); MUR 6038 (Doug Lamborn, *et al.*) (dismissing as a matter of prosecutorial discretion allegations of coordination arising out of groups sharing voter lists through a vendor).

1 factors must be satisfied in order to meet the definition of a “common vendor,” it is unnecessary
2 to analyze the second or third factors.⁶⁶ And because the information before the Commission is
3 insufficient to satisfy the conduct prong, it is unnecessary to analyze the payment and content
4 prongs. Accordingly, the Commission finds no reason to believe Respondent Committees
5 violated 52 U.S.C. §§ 30116 or 30118 by receiving excessive or prohibited in-kind contributions
6 in the form of communications coordinated through alleged common vendors Catalist and NGP
7 VAN.

8 **C. The DNC and Catalist Did Not Solicit, Receive, or Direct Soft Money**

9 Finally, the Complaint alleges that the DNC established, finances, maintains, or controls
10 Catalist and through Catalist has accepted contributions in violation of the soft money ban.⁶⁷
11 The Complaint specifically points to the investments that Catalist has received as examples of
12 such contributions not subject to the limits and prohibitions of the Act.⁶⁸

13 The Act prohibits national party committees from soliciting, receiving, or directing
14 another person to make a contribution, donation, or transfer of funds, or any other thing of value,
15 that is not subject to the prohibitions, limitations, and reporting requirements of the Act.⁶⁹ This
16 “soft-money ban” also applies to entities that are directly or indirectly established, financed,

⁶⁶ Even if Catalist were to satisfy all three factors of the “common vendor” standard, the company appears to qualify for the firewall “safe harbor” of the coordination standard. *See* 11 C.F.R. § 109.21(h)(1)-(2). According to the regulations, the conduct prong of the coordination standard is not met if a vendor has established and implemented a written firewall policy that is designed and implemented to prohibit the flow of information between employees providing services for a person paying for a communication and the employees providing services to a candidate identified in the communication or his committee, an opponent, or a political party. *Id.* Catalist has supplied a copy of its firewall policy, which appears to meet the requirements of the safe harbor, *see* Catalist Resp. at 9 & Ex. B, and Complainant has presented no information suggesting that the firewall is insufficient or ineffective.

⁶⁷ Compl. at 18.

⁶⁸ *Id.*

⁶⁹ 52 U.S.C. § 30125; *see* 11 C.F.R. § 300.10(a).

1 maintained, or controlled by a national party committee.⁷⁰ Ten non-exclusive factors
2 (collectively, “EFMC factors”) set out in 11 C.F.R. § 300.2(c)(2) determine whether a person or
3 entity (“sponsor”) “directly or indirectly established, financed, maintained or controlled” another
4 person or entity under 52 U.S.C. § 30125. These factors must be examined in the context of the
5 overall relationship between the sponsor and the entity to determine whether the presence of any
6 factor or factors is evidence that the sponsor “directly or indirectly established, financed,
7 maintained or controlled” the entity.⁷¹

8 Here, the DNC and Catalist do not appear to have violated these provisions of the Act.
9 The Complaint focuses on two EFMC factors that it believes demonstrate the relationship
10 between the DNC and Catalist. First, the Complaint contends that Harold Ickes’s overlapping
11 membership in Catalist and the DNC indicates a formal or ongoing relationship between the two
12 organizations.⁷² Second, the Complaint argues that Ickes’s role and the investments by
13 prominent Democratic donors demonstrate that the DNC had an active or significant role in the
14 formation of Catalist.⁷³

15 Although Ickes is a DNC member and two of Catalist’s investors have supported
16 Democratic candidates and causes, the facts demonstrate that, “in the context of the overall
17 relationship.” 11 C.F.R. § 300.2(c)(1), Catalist is not established, financed, maintained, or
18 controlled by the DNC. As affirmed in the Quinn Affidavit, and the declaration of DNC CFO
19 and Custodian of Records, Brad Marshall, the DNC does not own any Catalist voting stock or

⁷⁰ 11 C.F.R. § 300.10(c)(2).

⁷¹ *Id.*

1 securities⁷⁴; have voting power or other decision-making authority over Catalist and does not
2 participate in its governance⁷⁵; have the authority or ability to hire, appoint, demote, or otherwise
3 control the officers, or other decision-making employees of Catalist⁷⁶; or provide funds or goods
4 to Catalist other than those it has paid for services rendered.⁷⁷ Moreover, even though Ickes is a
5 DNC member, he is only 1 of 451 DNC members, and 1 of 30 members of the DNC's Rules and
6 Bylaws Committee, and the mere involvement of one DNC member in Catalist, a private
7 venture, does not establish that Catalist is controlled by the DNC or acts at its behest.

8 Even if the Commission were to assume that the DNC established Catalist, a violation of
9 section 30125 exists only if the DNC or Catalist accepted contributions, donations, or transfers of
10 funds, or any other thing of value that is not subject to the Act's source and amount limitations.⁷⁸
11 We are aware of no information, however, that suggests that any funds Catalist receives are not
12 provided in exchange for the goods and services it provides its clients or as part of a legitimate
13 business venture on the part of its investors, as Catalist contends. Accordingly, the Commission
14 finds no reason to believe that Catalist and the DNC violated 52 U.S.C. § 30125 by soliciting,
15 receiving, or directing contributions, donations, transfers of funds, or any other thing of value,
16 that is not subject to the prohibitions, limitations, and reporting requirements of the Act.

⁷⁴ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(i).

⁷⁵ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(ii).

⁷⁶ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(iii).

⁷⁷ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(vii)-(viii).

⁷⁸ 52 U.S.C. § 30125; *see* 11 C.F.R. § 300.10(a)(1).

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS
APPENDIX A

RESPONDENTS:^{*}

Democratic National Committee and Andrew Tobias in his official capacity as treasurer

Democratic Senatorial Campaign Committee and Deanna Nesburg in her official capacity as treasurer[†]

Democratic Congressional Campaign Committee and Kelly C. Ward in her official capacity as treasurer[‡]

Catalist, LLC

NGP VAN, LLC

State & Local Party Committee

Arizona State Democratic Central Executive

Respondents:

Committee and Rick McGuire in his official capacity as treasurer

^{*} The following Respondent Committees did not file a response to the Complaint: Adam Clayton Powell for Congress, Arizona State Democratic Central Executive Committee, Battle for Congress, Beale for Congress, Bonnie Watson Coleman for Congress, Citizens for Boyle, Clarke for Congress, Clay Aiken for North Carolina, Committee to Elect Alan Grayson, Committee to Elect Keith Ruehl, Committee to Elect Paul Clements, Connie Johnson for Oklahoma, Crisco for Congress, Denney for Congress, Dilan for New York, Dutch Ruppersberger for Congress, Espallat for Congress, Espero for Congress, Friends of Alexandra, Friends of Amy Tavo, Friends of Curtis C. Osborne, Friends of Forrest Dunbar, Friends of Joe Baca 2014, Friends of Raj Kittappa, Friends of Terry Adams, Friends of Roy Cho Inc., Friends of Wesley Reed, Gallardo for Congress, Gutierrez for Congress, Headrick for Congress, Hughes for Congress, Jackie Speier for Congress, James Mitchell for Congress, Janice Kovach for Congress, Kanuth for Congress, Kelly Westlund for Congress, Louie Minor for Congress, Marcus Brandon for Congress, Marianne Williamson for Congress, Mark Levine for Congress, Inc., Mary Ellen Balchunis for Congress, Matt for Oklahoma, Matt Miller for Congress 2014, McNeerney for Congress, Monterey County Democratic Central Committee Federal, Moore for Congress, Mowrer for Iowa, Nels Mitchell for Idaho, New Jersey Democratic State Committee, People for Rick Weiland, Peterson for Congress, Richard Bolger for Congress, Ron Leach for Congress Campaign, Rudy Hobbs for Congress, Schwartz for Congress, Scott for Congress, Sharon Sund for Congress, Sheila Oliver for U.S. Senate, Skinner for Congress '14, Susan Grettenberger for Congress, Taylor for US Senate, The Niki Tsongas Committee, Tony Cardenas for Congress, Trammell for Congress, Trivedi for Congress, Troy Jackson for Congress, Vincent Gregory for Congress, Visclosky for Congress, Wes Neuman for Congress.

[†] Respondents denoted by this symbol submitted a joint response.

[‡] Respondents denoted by this symbol submitted a joint response.

1 Democratic Executive Committee of Florida and
2 Judy Mount in her official capacity as treasurer[§]
3
4 Maine Democratic State Committee and Betty
5 Johnson in her official capacity as treasurer[§]
6
7 Mississippi Democratic Party PAC and Ryan
8 Brown in his official capacity as treasurer[§]
9
10 Monterey County Democratic Central Committee
11 Federal and Thomas Montgomery in his official
12 capacity as treasurer
13
14 New Jersey Democratic State Committee and Kelly
15 Stewart Maer in her official capacity as treasurer
16
17 Democratic Party of New Mexico and Robert Lara
18 in his official capacity as treasurer
19
20 Ohio Democratic Party and Fran Alberty in her
21 official capacity as treasurer[§]
22
23 Tennessee Democratic Party and Wade Munday in
24 his official capacity as treasurer[§]
25
26 Texas Democratic Party and Gilberto Hinojosa in
27 his official capacity as treasurer[§]
28
29 Vermont State Democratic Committee Federal
30 Account and James Ashley in his official capacity
31 as treasurer[§]
32
33 Authorized Committee Respondents: A Whole Lot of People for Grijalva Congressional
34 Committee and Maya Castillo in her official
35 capacity as treasurer[†]
36
37 Aaron Woolf for Congress and Sue Montgomery
38 Corey in her official capacity as treasurer[†]

[§] Respondents denoted by this symbol submitted a joint response.

1 Adam Clayton Powell for Congress and Mark Jay
2 Weinstein in his official capacity as treasurer
3
4 Adam Smith for Congress Committee and Jay
5 Petterson in his official capacity as treasurer**
6
7 Aimee Belgard for Congress and Sander Friedman
8 in his official capacity as treasurer†
9
10 Al Franken for Senate 2014 and Thomas H. Borman
11 in his official capacity as treasurer†
12
13 Alaskans for Begich 2014 and Connie Sanders in
14 her official capacity as treasurer†
15
16 Alex Sink for Congress and Jennifer May in her
17 official capacity as treasurer†
18
19 Alison for Kentucky and Robert C. Stilz III in his
20 official capacity as treasurer†
21
22 Amanda Curtis for Senate and Mary Sexton in her
23 official capacity as treasurer†
24
25 Americans for Gabriel Rothblatt and Taj Alice
26 Jones Rothblatt in her official capacity as treasurer†
27
28 Arni Bera for Congress and Jennifer May in her
29 official capacity as treasurer
30
31 Andre Carson for Congress and Timothy J.
32 Moriarty in his official capacity as treasurer
33
34 Anesa for Iowa and Eric Bearbower in his official
35 capacity as treasurer
36
37 Ann Callis for Congress and Jennifer May in her
38 official capacity as treasurer†

** Respondents denoted by this symbol submitted a joint response.

1 Appel for Iowa, Inc. and Sally Pedersen in her
2 official capacity as treasurer[†]

3 Barbara Lee for Congress and Loraine Binion in her
4 official capacity as treasurer

5 Barbara Mulvaney for Congress and Jana Mulvaney
6 in her official capacity as treasurer

7 Battle for Congress and Gil Baird in his official
8 capacity as treasurer

9 Beale for Congress and Steven R. Burris in his
10 official capacity as treasurer

11 Beatty for Congress and Jeffrey A. Ruppert in his
12 official capacity as treasurer[†]

13 Becerra for Congress and Robert Herrera in his
14 official capacity as treasurer[†]

15 Bellows for Senate and Daniel Hildreth in his
16 official capacity as treasurer[†]

17 Ben Nelson 2012 and Jessica Lathrop in her official
18 capacity as treasurer[†]

19 Beto O'Rourke for Congress Committee and
20 Susannah Byrd in her official capacity as treasurer[†]

21 Bill Foster for Congress and Aesook Byon in his
22 official capacity as treasurer[†]

23 Blumenauer for Congress and Henry Hewitt in his
24 official capacity as treasurer[†]

25 Bobby for Michigan and Daniel Pydyn in his
26 official capacity as treasurer[†]

27 Bock for Congress and Steven Goldberg in his
28 official capacity as treasurer

1 Bonamici for Congress and Elise Greene in her
2 official capacity as treasurer[†]

3 Bonnie Watson Coleman for Congress and Donna
4 Genges Watson in her official capacity as treasurer

5 Brad Ashford for Congress and Frank Barrett in his
6 official capacity as treasurer[†]

7 Braley for Iowa and Theresa L. Kehoe in her
8 official capacity as treasurer[†]

9 Brenda Lawrence for Congress and Lindsay
10 Angerholzer in her official capacity as treasurer[†]

11 Brian Higgins for Congress and Gary Kanaley in his
12 official capacity as treasurer[†]

13 Bruce Davis for Congress and Glenda Denise Clark
14 in her official capacity as treasurer

15 Bruce Elder for Congress and Larry Hoover in his
16 official capacity as treasurer

17 Butterfield for Congress and Scott R. Falmlen in his
18 official capacity as treasurer[†]

19 Cain for Congress and Jeremy Fischer in his official
20 capacity as treasurer^{**}

21 Cannon for Congress and Jennifer May in her
22 official capacity as treasurer[†]

23 Carl Sciortino Committee and Francis Pemberton
24 Brown in her official capacity as treasurer[†]

25 Carol Shea-Porter for Congress and Mary
26 Dimodica-Kulju in her official capacity as treasurer[†]

27 Cartwright for Congress and Jennifer May in her
28 official capacity as treasurer[†]

1 Castor for Congress and Amy Diamond in her
2 official capacity as treasurer[†]

3 Castro for Congress and Jose H. Villareal in his
4 official capacity as treasurer

5 Childers for Senate Inc. and Marilyn Jones in her
6 official capacity as treasurer[†]

7 Chris Coons for Delaware and Judith Zamore in her
8 official capacity as treasurer[†]

9 Cicilline Committee and Nancy L. Benoit in her
10 official capacity as treasurer[†]

11 Citizens for Boyle and Lindsay Angerholzer in her
12 official capacity as treasurer

13 Citizens for Michael Wager and Peggy Gries Wager
14 in her official capacity as treasurer[†]

15 Clarke for Congress and Ray L. Trotman in his
16 official capacity as treasurer[†]

17 Clay Aiken for North Carolina and Eugene Conti in
18 his official capacity as treasurer

19 Cohn for Congress and Bob Friedman in his official
20 capacity as treasurer[†]

21 Cole for Congress and Nicholas Finc in his official
22 capacity as treasurer[†]

23 Committee to Elect Alan Grayson and Dustin
24 Andersen in his official capacity as treasurer

25 Committee to Elect Abel J Tapia and Keith
26 Carpenter in his official capacity as treasurer

27 Committee to Elect Gary L. Ackerman, Inc. and
28 Robert Barnett in his official capacity as treasurer[†]

1 Committee to Elect Keith Ruehl and Anthony
2 Joseph Delmonte in his official capacity as treasurer
3
4 Committee to Elect Leslie to Congress and Judy
5 Pingel in her official capacity as treasurer[†]
6
7 Committee to Elect Martha Robertson Enid Littman
8 in her official capacity as treasurer[†]
9
10 Committee to Elect Paul Clements and Allen Webb
11 in his official capacity as treasurer
12
13 Committee to Re-Elect Henry "Hank" Johnson and
14 Malcolm A. Cunningham in his official capacity as
15 treasurer[†]
16
17 Committee to Re-Elect Linda Sanchez and Jennifer
18 May in her official capacity as treasurer
19
20 Committee to Re-Elect Loretta Sanchez and
21 Katharine Meyer Borst in her official capacity as
22 treasurer[†]
23
24 Committee to Re-Elect Nydia M. Velazquez and
25 Betty Diana Arce in her official capacity as
26 treasurer[†]
27
28 Connie Johnson for Oklahoma and Linda J.
29 Huggins in her official capacity as treasurer
30
31 Connolly for Congress and John Jennison in his
32 official capacity as treasurer[†]
33
34 Cooper for Congress and Robert A. Davidson in his
35 official capacity as treasurer
36
37 Corry Westbrook for Congress and Catherine E.
38 Wenzing in her official capacity as treasurer[†]
39
40 Cory Booker for Senate and Scott Kobler in his
41 official capacity as treasurer

1 Courtney for Congress and Tim Poloski in his
2 official capacity as treasurer[†]

3 Crisco for Congress and Keith Crisco in his official
4 capacity as treasurer

5 Crowley for Congress and Scott G. Kaufman in his
6 official capacity as treasurer[†]

7 Dan Lipinski for Congress and Jerome R. Hurckes
8 in his official capacity as treasurer

9 David M. Alameel for United States Senate and
10 David Pulling in his official capacity as treasurer

11 Daylin for Congress and Christopher Massicotte in
12 his official capacity as treasurer

13 Debbie Dingell for Congress and Martha Darling in
14 her official capacity as treasurer[†]

15 Debbie Wasserman Schultz for Congress and
16 Lawrence Wasserman in his official capacity as
17 treasurer[†]

18 Defazio for Congress and Jef A. Green in his
19 official capacity as treasurer[†]

20 Delbene for Congress and Jay Petterson in his
21 official capacity as treasurer[†]

22 Denney for Congress and Wayne Harrison in his
23 official capacity as treasurer

24 Denny Heck for Congress and Jay Petterson in his
25 official capacity as treasurer^{**}

26 Diana Degette for Congress and Edgar Neel in his
27 official capacity as treasurer[†]

28 Dilan for New York and Christian Espinal in his
29 official capacity as treasurer

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1 Doggett for Congress and James E. Cousar in his
2 official capacity as treasurer[†]

3 Domina for Nebraska Inc. and Fred A. Lockwood in
4 his official capacity as treasurer[†]

5 Donald M. Payne Jr. for Congress and H. O'Neil
6 Williams in his official capacity as treasurer[†]

7 Donna Edwards for Congress and Janice Edwards
8 in her official capacity as treasurer[†]

9 Dr. Raul Ruiz for Congress and John Pinkney in his
10 official capacity as treasurer[†]

11 Duckworth for Congress and Keith D. Lowey in his
12 official capacity as treasurer[†]

13 Dutch Ruppersberger for Congress and David C.
14 Deger in his official capacity as treasurer

15 Ebbin for Congress and Patsy Ticer in her official
16 capacity as treasurer[†]

17 Ed Jany for Congress and Jennifer May in her
18 official capacity as treasurer[†]

19 Eggman for Congress 2014 and Jay Petterson in his
20 official capacity as treasurer^{**}

21 Ehrlich for Congress and Kirsten L. Koester in her
22 official capacity as treasurer[†]

23 Elect April Freeman and Betty Kostrach in her
24 official capacity as treasurer

25 Elisabeth Jensen for Congress and Laura Anne
26 D'Angelo in her official capacity as treasurer^{**}

27 Elizabeth Colbert Busch for Congress and Claus
28 Busch in his official capacity as treasurer[†]

1 Ellison for Congress and Carla Kjellberg in her
2 official capacity as treasurer[†]

3 Eloise Gomez Reyes for Congress and William P.
4 Smith in his official capacity as treasurer[†]

5 Enyart for Congress and Brent M. Gaines in his
6 official capacity as treasurer[†]

7 Erin Bilbray for Congress and William Stanley in
8 his official capacity as treasurer[†]

9 Erin McClelland for Congress and Douglas
10 Campbell in his official capacity as treasurer[†]

11 Espaillat for Congress and Rafael Lantigua in his
12 official capacity as treasurer

13 Espero for Congress and Bryan Gallarde in his
14 official capacity as treasurer

15 Euille for Congress and Lynnwood G. Campbell in
16 his official capacity as treasurer[†]

17 Fattah for Congress and Roger J. Jackson, Jr. in his
18 official capacity as treasurer[†]

19 Fausz for Congress and Jonathan Wheeler in his
20 official capacity as treasurer[†]

21 Festersen for Congress and Mike Abramson in his
22 official capacity as treasurer

23 Filemon Vela for Congress and Mary Jo Vela in her
24 official capacity as treasurer^{**}

25 Fred Kundrata for Congress Committee and
26 William M. Bristol in his official capacity as
27 treasurer

28 Frederica S. Wilson for Congress and Larry
29 Handfield in his official capacity as treasurer[†]

1 Friends for Gregory Meeks and Patsy A. Simmons
2 in her official capacity as treasurer[†]

3 Friends for Jim McDermott and Philip Lloyd in his
4 official capacity as treasurer**

5 Friends of Alexandra and Alexandra Eidenberg in
6 her official capacity as treasurer

7 Friends of Amy Tavio and Sarah Hyder in her
8 official capacity as treasurer

9 Friends of Bill Tilghman and Christian D. Tilghman
10 in his official capacity as treasurer

11 Friends of Cheri Bustos and Jeanette Hunter in her
12 official capacity as treasurer[†]

13 Friends of Corrine Brown and Gloria Simmons in
14 her official capacity as treasurer[†]

15 Friends of Curtis C. Osborne and Christopher
16 Eugene Carter in his official capacity as treasurer

17 Friends of Dan Kildee and Jeff Tippett in his
18 official capacity as treasurer[†]

19 Friends of Dan Maffei and Herbert Millane in his
20 official capacity as treasurer[†]

21 Friends of Dick Durbin and Anne Dougherty in her
22 official capacity as treasurer[†]

23 Friends of Don Beyer and Mary Margaret Whipple
24 in her official capacity as treasurer[†]

25 Friends of Elizabeth Esty and Patti Flynn-Harris in
26 her official capacity as treasurer**

27 Friends of Estakio and Jay Petterson in his official
28 capacity as treasurer**

1 Friends of Farr and Sidney Slade in her official
2 capacity as treasurer[†]

3 Friends of Forrest Dunbar and Joe Samaniego in his
4 official capacity as treasurer

5 Friends of Houghton for Congress and Gregory
6 Paulson in his official capacity as treasurer

7 Friends of Jared Polis Committee and Edith R.
8 Hooton in her official capacity as treasurer**

9 Friends of Joe Baca 2014 and Joe Baca in his
10 official capacity as treasurer

11 Friends of John Barrow and Tom Bordeaux in his
12 official capacity as treasurer[†]

13 Friends of John Delaney and April McClain
14 Delaney in her official capacity as treasurer[†]

15 Friends of John Sarbanes and Meghan Stumpf in
16 her official capacity as treasurer[†]

17 Friends of Lois Capps and Andrew Siegel in his
18 official capacity as treasurer[†]

19 Friends of Mark Sickles and Charles R. Chambers,
20 Jr. in his official capacity as treasurer[†]

21 Friends of Mark Warner and Gerald S. McGowan in
22 his official capacity as treasurer[†]

23 Friends of Mary Landrieu, Inc. and Nancy
24 Marsiglia in her official capacity as treasurer[†]

25 Friends of Michelle and Deborah A. Armstrong in
26 her official capacity as treasurer

27 Friends of Patrick Murphy and Brian Foucart in his
28 official capacity as treasurer[†]

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1	Friends of Pete Gallego and Anthony Gutierrez in
2	his official capacity as treasurer†
3	Friends of Raj Kittappa and Jesse Fluck in his
4	official capacity as treasurer
5	Friends of Renteria and Jay Petterson in his official
6	capacity as treasurer**
7	Friends of Rosa Delauro and Patrick Charmel in his
8	official capacity as treasurer†
9	Friends of Roy Cho Inc. and Diane Wexler in her
10	official capacity as treasurer
11	Friends of Shaughnessy Naughton and Erinn Larkin
12	in her official capacity as treasurer†
13	Friends of Tate Macqueen and Lori Murphy in her
14	official capacity as treasurer†
15	Friends of Terry Adams and Robert D. Tuke in his
16	official capacity as treasurer
17	Friends of Val Arkoosh and Margaret Sager in her
18	official capacity as treasurer†
19	Friends of Warren Christopher and Leticia Carroll
20	Smith in her official capacity as treasurer
21	Friends of Wesley Reed and Teresa Klein in her
22	official capacity as treasurer
23	Fry for Congress and Peggy Stalder in her official
24	capacity as treasurer
25	Gallardo for Congress and Steve M. Gallardo in his
26	official capacity as treasurer
27	Gallego for Arizona and Rebecca Wininger in her
28	official capacity as treasurer†

1 Garamendi for Congress and Janica Kyriacopoulos
2 in her official capacity as treasurer[†]

3 Gaughan for Congress and Lawrence Denis
4 Gaughan in her official capacity as treasurer

5 Glen Gainer for Congress and Jennifer May in her
6 official capacity as treasurer[†]

7 Gloria Bromell Tinubu for Congress and Donald L.
8 Fowler in his official capacity as treasurer[†]

9 Greenstein for Congress and Jennifer May in her
10 official capacity as treasurer[†]

11 Gutierrez for Congress and Soraida Gutierrez in her
12 official capacity as treasurer

13 Hagan for US Senate Inc. and Dwight M. Davidson
14 III in his official capacity as treasurer[†]

15 Halter for Congress and Richard Klumpp in his
16 official capacity as treasurer

17 Halvorson for Congress and Jim Bush in his official
18 capacity as treasurer

19 Hanabusa for Hawaii and George S. Yamamoto in
20 his official capacity as treasurer

21 Hansen Clarke for Congress and Choi Palms-Cohen
22 in her official capacity as treasurer[†]

23 Harris for Wisconsin and Susan E. Harris in her
24 official capacity as treasurer

25 Headrick for Congress and Sunny Jewel Murray in
26 her official capacity as treasurer

27 Herring for Congress and Shaunica Pridgen in her
28 official capacity as treasurer

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1 Hillary Clinton for President and Shelly R. Moskwa
2 in her official capacity as treasurer
3 Himes for Congress and Kathleen Digennaro
4 Warner in her official capacity as treasurer[†]
5 Hodges for Congress and Cynthia Nowell in her
6 official capacity as treasurer
7 Hope for Congress and Elizabeth L. Wildhack in
8 her official capacity as treasurer[†]
9 Horsford for Congress and Piper Overstreet in her
10 official capacity as treasurer[†]
11 Houston Barnes for Congress Committee and Brice
12 Barnes in his official capacity as treasurer
13 Hoyer for Congress and Amy Pritchard in her
14 official capacity as treasurer[†]
15 Huffman for Congress 2014 and Stacy E. Owens in
16 her official capacity as treasurer[†]
17 Hughes for Congress and Mark A. Fiore in his
18 official capacity as treasurer
19 Hutto for US Senate and Rebekah F. Durr in her
20 official capacity as treasurer
21 Ikaika for Hawaii and Stacey Edralin in her official
22 capacity as treasurer[†]
23 Jackie McPherson for Congress and Mary Anne
24 Salmon in her official capacity as treasurer
25 Jackie Speier for Congress and Russell Miller in his
26 official capacity as treasurer
27 James Lee Witt for Congress and Bob Nash in his
28 official capacity as treasurer

CONFIDENTIAL

1 James Mitchell for Congress and Ronnie Devine in
2 his official capacity as treasurer

3 Janice Hahn for Congress and James Cross official
4 capacity as treasurer[†]

5 Janice Kovach for Congress and Peter D. Nichols in
6 his official capacity as treasurer

7 Janis Kent Percefull for Congress and Faith
8 Samantha Sherman in her official capacity as
9 treasurer

10 Jeff Holmes for Congress and Greg S. Mapes in his
11 official capacity as treasurer

12 Jeff Merkley for Oregon and Elise Greene in her
13 official capacity as treasurer[†]

14 Jeffries for Congress and Lenu H. Singletary III in
15 his official capacity as treasurer

16 Jennifer Garrison for Congress and Russell Garrison
17 in his official capacity as treasurer

18 Jessica McCall for Congress and Emerson
19 Merkersen in his official capacity as treasurer

20 Jim Graves for Congress and Peter Donohue in his
21 official capacity as treasurer

22 Jim Read for Congress and Christi Siver in her
23 official capacity as treasurer

24 Joanne Dowdell for Congress and Joanne Dowdell
25 in her official capacity as treasurer[†]

26 Joe Garcia for Congress and Roland Sanchez-
27 Medina in his official capacity as treasurer[†]

28 Joe Kennedy for Congress and David N. Martin in
29 his official capacity as treasurer[†]

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1 Joe Palumbo for Congress and Keith Buckhout in
2 his official capacity as treasurer

3 John Carney for Congress and Charles J. Durante in
4 his official capacity as treasurer**

5 John Foust for Congress and Sue Boucher in her
6 official capacity as treasurer

7 John Lewis for Congress and Michael Collins in his
8 official capacity as treasurer†

9 John Tierney for Congress and George Atkins in his
10 official capacity as treasurer†

11 Julia Brownley for Congress and Jennifer May in
12 her official capacity as treasurer†

13 Kanuth for Congress and Robert Courtney in his
14 official capacity as treasurer

15 Kaptur for Congress and Thomas Jaffee in his
16 official capacity as treasurer†

17 Karen Bass for Congress and Stephen J. Kaufman
18 in his official capacity as treasurer†

19 Karen Spilka for Congress Committee and Judy
20 Sandra Kalisker in her official capacity as
21 treasurer**

22 Katherine Clark for Congress and Gemma W.
23 Martin in her official capacity as treasurer†

24 Kathleen Rice for Congress and Margaret May in
25 her official capacity as treasurer**

26 Keep Nick Rahall in Congress Committee and
27 Edward Rahall in his official capacity as treasurer†

28 Kelly Westlund for Congress and Larry MacDonald
29 in his official capacity as treasurer

100-241001-0001

1 Kevin Strouse for Congress and Ronald L. Fader in
2 his official capacity as treasurer[†]
3
4 Kind for Congress Committee and Brent Smith in
his official capacity as treasurer[†]
5
6 Kirkpatrick for Arizona and Daniel A. Flores in his
official capacity as treasurer[†]
7
8 Korpe for Congress and Satish W. Korpe in his
official capacity as treasurer[†]
9
10 Koutoujian for Congress and Barbara Foley in her
official capacity as treasurer
11
12 Kultala for Congress and Carol Marinovich in her
official capacity as treasurer[†]
13
14 Kurt Schrader for Congress and Jeff A. Green in his
official capacity as treasurer[†]
15
16 Kuster for Congress, Inc. and Charles Willing in his
official capacity as treasurer[†]
17
18 Kyrsten Sinema for Congress and Judith Allen in
her official capacity as treasurer[†]
19
20 Laferla for Congress and Frances Miller in her
official capacity as treasurer[†]
21
22 Langevin for Congress and Edward A. Giroux in his
official capacity as treasurer[†]
23
24 Lara for New Mexico and Jennifer May in her
official capacity as treasurer[†]
25
26 Larson for Congress and Barry Feldman in his
official capacity as treasurer[†]
27
28 Laura Fjeld for Congress Committee and Deborah
Hylton in her official capacity as treasurer[†]

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1 Lavellee for Congress and Ruth Lavellee in her
2 official capacity as treasurer

3 Lavern Chatman for Congress and Angela Moody
4 in her official capacity as treasurer

5 Lenda Sherrell for Congress and Richard F. Laroche
6 in his official capacity as treasurer[†]

7 Levin for Congress and Jeremy Mahrle in his
8 official capacity as treasurer

9 Loeb sack for Congress and Ian J. Russell in his
10 official capacity as treasurer[†]

11 Lofgren for Congress and Mark B. Fredkin in his
12 official capacity as treasurer[†]

13 Lois Frankel for Congress and Janica
14 Kyriacopoulos in her official capacity as treasurer[†]

15 Lopez for Congress and Amy Lewis in her official
16 capacity as treasurer[†]

17 Louie Minor for Congress and Anna Vazquez in her
18 official capacity as treasurer

19 Louise Slaughter Re-Election Committee and Nora
20 E. Tuthill in her official capacity as treasurer[†]

21 Lucille Roybal-Allard for Congress and A.
22 Christian Hart in his official capacity as treasurer[†]

23 Maguire for Us and Lisa Sciancalepore in her
24 official capacity as treasurer

25 Malcolm Graham for Congress and Donnie T.
26 Simmons in his official capacity as treasurer[†]

27 Maloney for Congress and Melissa A. Mendez in
28 her official capacity as treasurer

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1 Marc Veasey Congressional Campaign Committee
2 and Charles G. Langham, III in his official capacity
3 as treasurer[†]

4 Marcus Brandon for Congress and Cecil Antonio
5 Brockman in his official capacity as treasurer

6 Margie Wakefield for Congress and Doni Mooberry
7 Slough in his official capacity as treasurer[†]

8 Marianne Williamson for Congress and Kevin
9 Heneghan in his official capacity as treasurer

10 Marjorie 2014 and Jennifer May in her official
11 capacity as treasurer[†]

12 Mark Levine for Congress Inc. and Samson March
13 in his official capacity as treasurer

14 Mark Pocan for Congress and Sondy Pope in her
15 official capacity as treasurer[†]

16 Mark Pryor for U.S. Senate and Bob Edwards in his
17 official capacity as treasurer[†]

18 Mark Takai for Congress and Edward Dion
19 Kaimihana in his official capacity as treasurer[†]

20 Mark Takano for Congress and Jennifer May in her
21 official capacity as treasurer[†]

22 Martin Skelly for Congress and Kelly Skelly in her
23 official capacity as treasurer

24 Mary Ellen Balchunis for Congress and Elizabeth
25 A. Parziale in her official capacity as treasurer

26 Mary M. Headrick for Congress and Phyllis Brown
27 in her official capacity as treasurer

28 Mary Rose Wilcox for Congress and Aaron Kizer in
29 his official capacity as treasurer[†]

1987-1990

1	Matsui for Congress and David K. Murphy in his
2	official capacity as treasurer†
3	Matt for Oklahoma and Erica Silverstein in her
4	official capacity as treasurer
5	Matt Miller for Congress 2014 and Shelly R.
6	Moskwa in her official capacity as treasurer
7	Maxey Scherr for US Senate and Silvestre Reyes in
8	his official capacity as treasurer
9	McAffrey for Congress and John David Stinson in
10	his official capacity as treasurer†
11	McCollum for Congress and Mary Pat Lee in her
12	official capacity as treasurer†
13	McNerney for Congress and Sue Staley in her
14	official capacity as treasurer
15	Mike Honda for Congress and Vicki Day in her
16	official capacity as treasurer†
17	Mike Thompson for Congress and Tom Hannigan
18	in his official capacity as treasurer†
19	Monica Vernon for Congress and Robert Rush in
20	his official capacity as treasurer†
21	Montanans for Lewis and Holly Giarraputo in her
22	official capacity as treasurer
23	Moore for Alaska and Carolyn H. Covington in her
24	official capacity as treasurer
25	Moore for Congress and Ellen Bravo in her official
26	capacity as treasurer
27	Morton for Congress and Linda A. Ward in her
28	official capacity as treasurer

1 Moulton for Congress and Aaron Bartnick in his
2 official capacity as treasurer**

3 Mowrer for Iowa and Dennis Skinner in his official
4 capacity as treasurer

5 Nadler for Congress and Lewis Weissman in his
6 official capacity as treasurer†

7 Nancy Najarian for Congress and Michael Stimson
8 in his official capacity as treasurer

9 Nancy Pelosi for Congress and Steven Swig in his
10 official capacity as treasurer†

11 Natalie Tennant for Senate and Arden J. Curry II in
12 his official capacity as treasurer†

13 Nels Mitchell for Idaho and Susan Eastlake in her
14 official capacity as treasurer

15 Nick Casey for Congress and Martin Glasser in his
16 official capacity as treasurer†

17 Nita Lowey for Congress and Richard Melnikoff in
18 his official capacity as treasurer†

19 Nolan for Congress Volunteer Committee and
20 James A. Dechaine in his official capacity as
21 treasurer†

22 Norm Mosher for Congress and Samantha Carol
23 Van Saun in her official capacity as treasurer†

24 Nunn for Senate and James S. Grien in his official
25 capacity as treasurer†

26 Obama for America and Martin H. Nesbitt in his
27 official capacity as treasurer

28 Obermueller for Congress and Joanne Obermueller
29 in her official capacity as treasurer†

1 O'Brien for Iowa and H. Daniel Holm Jr. in his
2 official capacity as treasurer[†]

3 Orman for U.S. Senate Inc. and Wynne Royce
4 Jennings in his official capacity as treasurer

5 Pallone for Congress and Warren Goode in his
6 official capacity as treasurer^{**}

7 Pallone for Senate and Peter D. Nichols in his
8 official capacity as treasurer^{**}

9 Pam Byrnes for Congress and Vicki Hopper in her
10 official capacity as treasurer[†]

11 Parrish for Congress and William F. Schoell in his
12 official capacity as treasurer[†]

13 Pascrell for Congress and Bernadette McPherson in
14 her official capacity as treasurer[†]

15 Pat Murphy for Iowa and Vicki Krug in her official
16 capacity as treasurer[†]

17 Patrick Henry Hays for Congress and Mike Hays in
18 his official capacity as treasurer[†]

19 Paul Tonko for Congress and Patrick J. Bulgaro in
20 his official capacity as treasurer[†]

21 Peiser for Congress and Patricia Cratty in her
22 official capacity as treasurer

23 People for Ben and Carmen Lujan in her official
24 capacity as treasurer[†]

25 People for Derek Kilmer and Jay Petterson in his
26 official capacity as treasurer[†]

27 People for Rick Weiland and Beverly Casey in her
28 official capacity as treasurer

1 Perlmutter for Congress and Karen J. Rokala in her
2 official capacity as treasurer[†]

3 Pete Aguilar for Congress and Jennifer May in her
4 official capacity as treasurer[†]

5 Peter Clemens for Congress and Tammy Clemens
6 in her official capacity as treasurer[†]

7 Peters for Michigan and Geraldine Buckles in her
8 official capacity as treasurer[†]

9 Peterson for Congress and Elliott A. Peterson in his
10 official capacity as treasurer

11 Pingree for Congress and Anne Rand in her official
12 capacity as treasurer[†]

13 Poetter for Congress and Kelly A. Marks in her
14 official capacity as treasurer

15 Quigley for Congress and Erica Kelly in her official
16 capacity as treasurer[†]

17 Rangel for Congress and David A. Paterson in his
18 official capacity as treasurer[†]

19 Reed Committee and Elizabeth R. Young in her
20 official capacity as treasurer[†]

21 Re-Elect McGovern Committee and William T.
22 Talcott in his official capacity as treasurer[†]

23 Richard Bolger for Congress and James B. Veltri in
24 his official capacity as treasurer

25 Richmond for Congress and Maple Gaines in her
26 official capacity as treasurer[†]

27 Rick Wade for Senate and G. Hubbard Smalls in his
28 official capacity as treasurer

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1 Ringo for Congress - Idaho Congressional District 1
2 and Ron Beitelspacher in his official capacity as
3 treasurer
4
5 Ritchie for Congress and Abbot Taylor in his
6 official capacity as treasurer**
7
8 Ro for Congress Inc. and Reena Roa in her official
9 capacity as treasurer**
10
11 Rob Joswiak for Congress and Zack Byrnes in his
12 official capacity as treasurer
13
14 Rob Zerban for Congress 2014 and Randy Bryce in
15 his official capacity as treasurer†
16
17 Robin Kelly for Congress and Ryan Vanmeter in his
18 official capacity as treasurer†
19
20 Robles for Congress and Silvia Castro in her official
21 capacity as treasurer†
22
23 Romanoff for Congress and Michael Hamrick in his
24 official capacity as treasurer†
25
26 Ron Barber for Congress and Laura T. Almquist in
27 her official capacity as treasurer†
28
29 Ron Leach for Congress Committee and Theresa
Drake in her official capacity as treasurer
30
31 Ruben Hinojosa for Congress and Vickie
Winpisinger in her official capacity as treasurer†
32
33 Rudy Hobbs for Congress and Brandon Asberry in
34 his official capacity as treasurer
35
36 Rush Holt for Senate and Robert J. Del Tufo in his
37 official capacity as treasurer†
38
39 Russ for Congress and Carol S. Warner in her
40 official capacity as treasurer

1 Sanford Bishop for Congress and Evelyn Turner
2 Pugh in her official capacity as treasurer[†]

3 Schatz for Senate and Keith Amemiya in his official
4 capacity as treasurer[†]

5 Schertzing for Congress and Mary Ruttan in her
6 official capacity as treasurer[†]

7 Schiff for Congress and Stephen Kaufman in his
8 official capacity as treasurer[†]

9 Schneider for Congress and Mark A. Levy in his
10 official capacity as treasurer[†]

11 Schwartz for Congress and Daniel Ciccariello in his
12 official capacity as treasurer

13 Scott Brion for Congress and Eric J. Loudenslager
14 in his official capacity as treasurer

15 Scott for Congress and Sean M. Williamson in his
16 official capacity as treasurer

17 Scott Peters for Congress and Nicholas R. Femia in
18 his official capacity as treasurer^{**}

19 Sean Eldridge for Congress and Michael Oates in
20 his official capacity as treasurer[†]

21 Sean Patrick Maloney for Congress and Holly
22 Giarraputo in her official capacity as treasurer[†]

23 Shaheen for Senate and Kathleen H. Goode in her
24 official capacity as treasurer[†]

25 Sharon Sund for Congress and Eugene Roberson in
26 his official capacity as treasurer

27 Sheila Oliver for US Senate and Jennie Oliver in
28 her official capacity as treasurer

1 Sherman for Congress and Stephen J. Kaufman in
2 his official capacity as treasurer[†]

3 Sherzan for Iowa and Susan Sherzan in her official
4 capacity as treasurer

5 Sinner for Congress and Jon Ewen in his official
6 capacity as treasurer[†]

7 Skinner for Congress '14 and Charles Joseph
8 Skinner in his official capacity as treasurer

9 Sona Mehring for Congress and Shawn Hunter in
10 his official capacity as treasurer

11 Stallings for Idaho and Cary Jones in his official
12 capacity as treasurer

13 Stanley Chang for Congress and Nathan Okubo in
14 his official capacity as treasurer

15 Stephen Lynch for Congress and Brian Miller in his
16 official capacity as treasurer

17 Stephen Lynch for Senate and Brian Miller in his
18 official capacity as treasurer[†]

19 Steve Cohen for Congress and Henry M. Turley in
20 his official capacity as treasurer[†]

21 Steve Israel for Congress Committee and Harris
22 Wiener in his official capacity as treasurer[†]

23 Stocker in Congress and Chuck Banks in his official
24 capacity as treasurer

25 Supporters of Shayan for Congress and Shayan H.
26 Modarres in his official capacity as treasurer

27 Susan Grettenberger for Congress and Isaac
28 Francisco in his official capacity as treasurer

1 Suzanne Patrick for Congress and Suzanne Patrick
2 in her official capacity as treasurer[†]

3 Swalwell for Congress and Shannon Fuller in her
4 official capacity as treasurer[†]

5 Swati Dandekar for Congress and Dennis J.
6 Naughton in his official capacity as treasurer[†]

7 Taylor for US Senate and Victor Russell Petty III in
8 his official capacity as treasurer

9 Ted Deutch for Congress Committee and Jeffrey
10 Weinstock in his official capacity as treasurer[†]

11 Terri Sewell for Congress and Edward A. Hosp in
12 his official capacity as treasurer[†]

13 Texans for Henry Cuellar Congressional Campaign
14 and Rosendo Carranco in his official capacity as
15 treasurer[†]

16 The Bill Keating Committee and David A. Doucette
17 in his official capacity as treasurer

18 The Markey Committee and Marie C. Carbone in
19 her official capacity as treasurer[†]

20 The Niki Tsongas Committee and Zoila Gomez in
21 her official capacity as treasurer

22 Tim Bishop for Congress and Molly Bishop in her
23 official capacity as treasurer[†]

24 Tim Ryan for Congress and Allen Ryan in his
25 official capacity as treasurer[†]

26 Tim Walz for US Congress and Gerald Maschka in
27 his official capacity as treasurer[†]

28 Titus for Congress and Jennifer May in her official
29 capacity as treasurer[†]

1 Toi for Illinois and Susan Jenkins in her official
2 capacity as treasurer

3 Tony Cardenas for Congress and David Gould in
4 his official capacity as treasurer

5 Trammell for Congress and David J. Irving in his
6 official capacity as treasurer

7 Trivedi for Congress and Bret Binder in his official
8 capacity as treasurer

9 Troy Jackson for Congress and Alan Lindquist in
10 his official capacity as treasurer

11 Tulsi for Hawai'i and Talia Tamayo Khurana in her
12 official capacity as treasurer[†]

13 Udall for Colorado and Ellen Marshall in her
14 official capacity as treasurer[†]

15 Udall for Us All and Carolyn Gonzales in her
16 official capacity as treasurer[†]

17 Van Hollen for Congress and Stacey Maud in her
18 official capacity as treasurer[†]

19 Vanderstelt for Congress and Deanna Taylor in her
20 official capacity as treasurer[†]

21 Vincent Gregory for Congress and Harold M.
22 Montgomery in his official capacity as treasurer

23 Visclosky for Congress and Michael Malczewski in
24 his official capacity as treasurer

25 Walrond for Congress and Torian J. Robinson in his
26 official capacity as treasurer[†]

27 Walsh for Montana and Holly Giarraputo in her
28 official capacity as treasurer

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- 1 Welch for Congress and John C. Candon in his
2 official capacity as treasurer[†]
- 3 Weldon Russell for Congress Campaign Committee,
4 and Bridget Herbert in her official capacity as
5 treasurer
- 6 Wendy Greuel for Congress and Stephen J.
7 Kaufman in his official capacity as treasurer[†]
- 8 Wes Neuman for Congress and Linda Neuman in
9 her official capacity as treasurer
- 10 Will Brownsberger for Congress and David Merfeld
11 in his official capacity as treasurer
- 12 Yarmuth for Congress and Sarah J. Martin in her
13 official capacity as treasurer[†]

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